

Exhibit L

1

COPY

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 WOODY ALLEN,

4 Plaintiff,

5 -against-

6 CONFIDENTIAL

7 AMERICAN APPAREL, INC.,

8 Defendant,

9 Civil Action No.: 08 Civ. 3179 (TPG) (KNF)

10 -----x

11 * * * C O N F I D E N T I A L * * *

12 620 Eighth Avenue
13 New York, New York

14 December 15, 2008
15 10:05 a.m.

16
17 Confidential Videotaped Deposition of
18 WOODY ALLEN, pursuant to Notice, before Sophie
19 Nolan, a Notary Public of the State of New
20 York.
21
22

23 ELLEN GRAUER COURT REPORTING CO. LLC
24 126 East 56th Street, Fifth Floor
New York, New York 10022
212-750-6434
25 Ref: 89231

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2 seen by American Apparel.

3 A. No, I have not seen these ads. I
4 have not seen them.

5 Q. And are any of the ads depicted in
6 this Defendant's 17 sleazy?

7 A. No, none of these ads are -- are
8 offensive.

9 Q. Thank you. You stated before that
10 you would prefer to do advertisements outside
11 of the United States?

12 A. Yes.

13 MR. ZWEIG: Objection as to the --
14 I'm sorry. Since he answered it, it
15 appeared as if you might have made it to
16 the end of your question. But why don't
17 you finish your question, after which I
18 have an objection, and then the witness
19 can answer the question if he's able to.

20 MR. SLOTNICK: I think we're done
21 with that Q and A.

22 MR. ZWEIG: I'm sorry?

23 MR. SLOTNICK: We are done with
24 that Q and A, but if you feel it
25 necessary to encumber the record with an

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2 objection at this point, go ahead.

3 MR. ZWEIG: I don't think it's
4 encumbering, Mr. Slotnick, and I do take
5 some objection to that. The fact is your
6 question mischaracterized the witness'
7 prior testimony and that was the basis
8 for my objection as to form, sir.

9 Q. Is it your belief that celebrity
10 endorsements are more handsomely rewarded in
11 Japan as opposed to America?

12 MR. ZWEIG: Objection as to the
13 form of the question, assumes facts not
14 in evidence, calls for speculation, and
15 for opinion.

16 A. I have no idea about that. I just
17 wouldn't -- I would have no idea whether you
18 could get more money in Japan than here. I
19 guess it depends on the person and the company.
20 I just don't know.

21 Q. Now, what has your income been
22 every year for the past ten years?

23 MR. ZWEIG: Objection as to the
24 form of the question and on the grounds
25 that it is harassing and private and

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2 personal information, and I'm going to
3 instruct the witness not to answer. And
4 if you persist in asking that question,
5 it is something that we will make a
6 motion about to the judge. And I would
7 ask if you have any follow-up questions,
8 to please go ahead and ask those
9 questions now so that all of the
10 questions of this ilk can then be placed
11 before the judge for a ruling.

12 MR. SLOTNICK: I would just like to
13 state that we believe that a person's
14 fair market value, a celebrity's fair
15 market value endorsement is related to
16 how much money they have made and also
17 Mr. Allen did bring up that his yearly
18 income was not affected by any of the
19 scandals with which he was involved in.

20 MR. ZWEIG: And I told you that
21 that line of questioning was irrelevant
22 and objectionable and I'm going to tell
23 you that the current line of questioning
24 is irrelevant and objectionable and
25 harassing and, therefore, unless you can

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2 come up for -- come up with a basis in a
3 right of publicity case for seeking such
4 information, which I suggest you have not
5 done, I will instruct the witness not to
6 answer and we can seek a ruling. If you
7 have any other questions to ask of this
8 type, please go ahead and ask them.

9 MR. SLOTNICK: I'll ask my
10 questions and if you feel it's proper to
11 instruct Mr. Allen not to answer, then
12 you can do that and we will address those
13 at a later time, if necessary. And, of
14 course, relevance is not a proper basis
15 to instruct someone not to answer.

16 MR. ZWEIG: I'm sorry, I made it
17 clear in my statement that while it was
18 irrelevant, the basis of my objection is
19 that it's harassing and that is a proper
20 ground under Rule 30.

21 MR. SLOTNICK: I'm not sure that it
22 is harassing --

23 MR. ZWEIG: Okay.

24 MR. SLOTNICK: -- but we will
25 address that --